SECTION C

PERFORMANCE WORK STATEMENT

MOAB REMEDIAL ACTION CONTRACT (RAC) PROJECT

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C.1 MOAB PROJECT OVERVIEW AND OBJECTIVES

C.1.1 Background

The DOE Moab Project Site is approximately 3 miles northwest of the City of Moab in Grand County, Utah, and includes the former Atlas uranium-ore processing facility. The site is situated on the west bank of the Colorado River at the confluence with Moab Wash. The site encompasses approximately 435 acres, of which approximately 130 acres are covered by the uranium mill tailings pile.

The processing facility was constructed in 1956 by the Uranium Reduction Company, which operated the facility until 1962 when the property was sold to Atlas. Atlas operated the site until 1984 under a license and regulatory authority provided by the Nuclear Regulatory Commission (NRC) in accordance with Title II of the Uranium Mill Tailings Radiation Control Act (UMTRCA). When the processing operations ceased in 1984, approximately 16 million tons (12 million cubic yards) of uranium tailings or residual radioactive material (RRM) (the term *RRM* is used throughout the PWS to reference the tailings and other contaminated materials from former uranium/vanadium processing) and contaminated soil had been stored in an unlined impoundment located in the northwest portion of the property.

Atlas proposed to reclaim the tailings pile for permanent disposal in its current location. As a result of the Atlas proposal, the NRC developed an *Environmental Impact Statement* (EIS) that focused primarily on on-site reclamation of the mill tailings. Atlas declared bankruptcy in 1998. In doing so, they relinquished their license and forfeited its reclamation bond. Because NRC could not legally possess a site it regulated, NRC appointed PricewaterhouseCoopers as the trustee of the Moab Mill Reclamation Trust and the licensee for the site. The trustee used the forfeited reclamation bond funds to initiate site reclamation, conduct ground water studies, and perform site maintenance activities.

The Floyd D. Spence National Defense Authorization Act for Fiscal Year 2001, Public Law 106-398 (the Act) stipulated that the license issued by NRC for the materials at the Moab Site be terminated and that the title and responsibility for cleanup be transferred to the DOE. Title to the site was transferred to DOE on October 25, 2001. Specifically, the EM 3.2 Office in Grand Junction, Colorado, now has primary responsibility for the Moab Site.

The Act further designated that the Moab Site undergo remediation in accordance with Title I of the UMTRCA, though certain sections of UMTRCA shall not apply. In accordance with the Act, DOE developed a Draft Plan for Remediation that evaluated DOE's remediation decision-making process and related technical issues. DOE approved the *Final Environmental Impact Statement* (FEIS) on July 25, 2005 which fulfilled the National Environmental Policy Act (NEPA) requirement of considering the full range of reasonable alternatives and associated environmental effects of significant federal actions. The preferred alternative identified in the FEIS included relocation of the tailings and associated wastes to the Crescent Junction off-site waste

disposal site using rail transportation as the primary transportation mode, with active ground water remediation. A *Record of Decision* (ROD) identifying the final remedy, consistent with the FEIS preferred alternative, was published on September 14, 2005. An Amended Record of Decision for the Remediation was approved in February 29, 2008. The ROD Amendment increased the flexibility to relocate the residual RRM using rail or truck. In June 2007, DOE awarded a task order which required design and installation of waste handling systems, moving RRM from Moab to Crescent Junction site, design and construction of the disposal cell in Crescent Junction, construction and operation of the RRM off loading facility, and operation of the disposal cell for final disposition of the RRM at Crescent Junction. DOE is conducting ongoing site operations, including RRM excavation, transportation, and disposal and maintenance activities

C.1.2 Moab Project Description

The Moab project scope consists of relocating tailings and associated wastes presently at the Moab Site to the disposal cell located at the Crescent Junction Site, reclaiming the Moab Site to the appropriate standards, including demolition of all man-made structures, and the remediation of any contaminated vicinity properties.

The Moab project scope for the Remedial Action Contract (RAC) can be divided into four general categories: (1), activities related to RRM excavation and conditioning and filling of intermodal containers at the Moab site, (2) transporting RRM from Moab to Crescent Junction, (3) disposal of the RRM at Crescent Junction, including interim and final cover placement, and (4) reclaiming the Moab site to appropriate standards, including demolition of man-made structures.

C.1.3 Contract Purpose and Objectives

The purpose of this contract is to continue making substantial progress towards remediation of remaining RRM including the remediation of the tailings pile, off-pile material, demolition of any man-made structure, remediation of contaminated sub-pile below the tailings, and the remediation of any remaining vicinity properties at the Moab Site in Utah.

The contract objectives are:

- Continue remediation of the site to achieve the appropriate surface cleanup standards as specified in 40 Code of Federal Regulations (CFR) Part 192; Subparts A, B, and C, and to dispose of RRM in the NRC approved disposal cell near Crescent Junction, Utah.

- Continue meeting the requirements of the Record of Decision for the Remediation of the Moab Uranium Mill Tailings, Grand and San Juan Counties, Utah, September 2005 and the Amended Record of Decision for the Remediation of the Moab Uranium Mill Tailings, Grand and San Juan Counties, Utah, February 29, 2008. The ROD Amendment increased the flexibility to relocate the residual RRM using rail or truck. DOE is sensitive to both the strong stakeholder desire that the

majority of the RRM be transported by rail and the continued utilization of the current basic approach and infrastructure.

- Safely achieve contract objectives.

C.2 Description of Project Performance Requirements

The contractor shall furnish all personnel, facilities, equipment, material, services and supplies (except for Government Furnished Services/Items identified in Attachment J-C and Services Provided by the Technical Assistance Contractor as identified in Attachment J-E), and otherwise do all things necessary to accomplish work in a safe, integrated, effective and efficient manner consistent with the PWS. In performing the work, the contractor shall comply with all applicable DOE orders and Local, State and Federal regulations, and comply with the Interface Requirements Matrix and Government Furnished Services provided in Section J, Attachment E.

C.2.1 Contract Transition

The contractor shall perform all transition activities consistent with all DOE requirements. Transition activities to be performed include, but are not limited to:

- The contractor shall submit a Contract Transition Plan for DOE approval. The Contract Transition Plan must include a description of all necessary transition activities, involved organizations, transition schedule including milestones, and the planned strategy for developing required documents.

- The contractor shall provide a weekly status of transition activities to DOE. The contractor shall establish routine status meetings with DOE and other organizations and contractors to review transition activities and issues. The frequency of the meetings should increase as the end of contract transition period approaches. The contractor shall coordinate directly with incumbent contractor, DOE, and other organizations and contractors to finalize any transition agreements required to assume full responsibility.

- The contractor shall conduct a Readiness Assessment and submit verification of readiness assessment to DOE, to assume full responsibility for contract requirements. A successful verification of readiness by DOE will lead to a Notice to Proceed.

- The contractor shall conduct a joint reconciliation of the government property inventory with the incumbent contractor(s) and DOE. This information shall be used to provide a property baseline for this contract, as well as information to closeout predecessor contracts.

- The contractor shall submit a Performance Management Baseline (PMB) in accordance with DOE Order 413.3B.

- The contractor shall develop and maintain its plans, procedures, programs, etc. for DOE approval. Contractors have three options for complying with this contract requirement:
  - With DOE approval, develop and submit for DOE approval new plans, procedures, programs, etc.;
  - With DOE approval, adopt the existing DOE-approved plans, procedures, programs, etc.; or
  - With DOE approval, modify and submit for DOE approval the prior contractor's DOE-approved plans, procedures, programs, etc.

C.2.2 Facility/Ground Maintenance

The contractor shall develop, document, and maintain a Facility/Ground Maintenance program that includes maintenance and operations as appropriate for all areas, facilities, and structures that are within the contractor's responsibility. The activities shall be tailored during the contract life-cycle in accordance with DOE Order 430.1B, Real Property Asset Management, and 10 CFR 851, Worker Safety and Health Program. Areas that will require site maintenance include, but are not limited to, the Former Atlas Legacy Building, Container Lidding Building, trailers, fencing, water systems located at Moab, sediment ponds/basins, other ponds and basins, rail and associated structures, haul roads, ditches and bridges, underpass, transformers, utility poles, etc. The contractor shall perform all facility/ground maintenance activities including, but not limited to, the following:

- Perform periodic facility inspections, including equipment and/or structure to assess facility structural integrity;
- Perform daily activities required to sustain property in a condition suitable for its designed purpose;
- Conduct preventative, predictive, and corrective maintenance actions;
- Maintain all trailers and trailer staging area (including utilities);
- Evaluate and implement utility optimization plans including re-routing of the utilities; and
- Provide Site Maintenance Activities (e.g., erosion control, equipment maintenance, etc.).

C.2.3 Excavation and Handling at Moab

C.2.3.1 Excavation of RRM

The work under this section includes all excavation activities, including debris, necessary for operating and maintaining the existing waste management and waste handling systems/methods to remove the RRM and other waste. The contractor shall prepare and submit an excavation plan for the Moab site which includes, but is not limited to, the details of the planned excavation method, the

excavation sequence, mixing of slimes and sands, segregation of oversize materials, and water management, including evaporation pond. RRM may be directly shipped to Crescent Junction; however, mixing of sands and slimes may be necessary in order to achieve acceptable moisture levels in the approximate range of moisture requirements identified in the Remedial Action Plan (RAP) for disposal at Crescent Junction and to minimize RRM carry back in containers. Spreading the RRM in contaminated areas of the Moab project site or conditioning of RRM within the 100 year floodplain shall be conducted ONLY with the prior written approval of the Contracting Officer. The contractor shall not condition RRM on the floor of the tailings pile that has been verified as being remediated.

The contractor will be responsible for the identification, characterization, packaging, transportation and disposal of any waste, including secondary waste, that may be generated based on its technical approach. The contractor shall manage and provide waste management support activities. Any waste that requires special handling, such as waste oil and non-RRM, shall be managed in accordance with the Moab Waste Management Plan. The Waste Management Plan shall be maintained and updated as necessary.

The off-pile soils originally comprised 305 acres; to date approximately 111 acres have been remediated and verified clean. The off-pile contaminated soils are wind deposits from the tailings pile and are very consistent across the site. The map entitled "Moab Non-Pile Soils Remediation", shows off-pile areas including the areas that were remediated. Vicinity Properties (VP) are property separate from DOE Uranium Mill Tailings Remedial Action (UMTRA) in the local community where RRM originated from the former ATLAS mill site and has been placed/transported to these properties through past activities. The contractor shall excavate and remediate these areas upon DOE's determination that additional work is necessary for these areas.

The contractor shall evaluate project waste management options and disposition D&D wastes consistent with requirements of regulatory agreements. Debris and other building material shall be sized in accordance with the NRC approved Remedial Action Plan. Oversize material will be transported from the Moab site to Crescent Junction using trucks.

In accordance with the approved procedures, the contractor shall monitor, track, and document data on RRM excavated, shipped, and disposed and shall submit an annual Interim Completion Reports on RRM excavated and disposed. This data shall be provided to the Technical Assistance Contractor (TAC) and DOE as required.

The contractor is responsible for excavating and relocating RRM at the Moab project and reclaiming the Moab site to the appropriate standards. The contractor shall control surface water erosion to the maximum extent practicable and re-vegetate the site and surrounding areas, as required.

Work under this section includes excavation of the Tailing Piles. The original tailings pile was 130 acres; to date, approximately ten acres have been remediated. The contractor shall excavate RRM in the sub-pile, if necessary, in order to meet remediation standards of 40 CFR192, Subpart A. The sub-pile is estimated to be 2 feet below the floor (defined by the interface of the lower section of the tailings and upper section of the native undisturbed stratigraphy), and are the tailings that meet 5 or 15 pCi/g as defined in 40 CFR192, Subpart A. Within the southwest corner of the tailing pile are the former mill site buildings and facilities. This debris was estimated to be 36,000 cubic yards and may be composed of steel beams, concrete slabs, concrete blocks, piping, sheet metal, and demolished milling equipment. In conjunction with the Former Atlas Mill Debris, there are vertical band drains (wicks) and manifolds located a few feet below the surface near the center of the tailings pile. Some of the debris may be *Oversize Material* in relationship to the requirements and specification of the RAP.

C.2.3.2 RRM Handling at Moab Site

The contractor shall ensure safe, efficient, and cost effective transfer of RRM in accordance with the ROD. The contractor is responsible for all aspects of the handling activities at Moab site including, but not limited to, movement of excavation equipment, trucks, container stackers, etc. in all areas including haul roads and all activities taking place at rail sidings. The contractor shall:

- Operate and maintain the material handling systems at Moab;
- Load RRM into containers;
- Manage and operate container movement;
- Conduct lidding and de-lidding operations
- Decontaminate the RRM containers as appropriate for transport;
- Haul RRM to Moab rail siding;
- Load and unload the containers onto/from the trucks;
- Load and unload containers onto/from the rail cars;
- Measure and record the carry back of RRM in containers returning from Crescent Junction. Ensure there is no more carry back than 1% by volume.

C.2.3.3 Evaporation Pond and Clean Water Construction Ponds

The contractor shall operate and maintain the evaporation and clean water construction ponds at the Moab Site. The evaporation ponds on top of the tailings pile collects contaminated groundwater from ground water wells operated by the TAC and can be used to manage of tailings pore fluids. The contractor shall use the evaporation ponds water for dust control within the contamination area at Moab site. All other dust control shall be performed using water from the clean water construction pond.

C.2.4 Demolition of Man-Made Structures

The decontamination and decommissioning (D&D) of work shall be performed and completed consistent with regulatory agreements and decisions that may include consideration of specific buildings for re-use. The D&D of existing facilities includes all *man-made structures*, and generally includes the following activities: regulatory document preparation, characterization, material removal and hazardous material abatement activities, deactivation (utilities isolation, re-routing of the utilities, etc.), removal of equipment, and demolition of structures/ components. The debris generated as a result of demolition activities is considered RRM and the current disposition path for this waste is at the Crescent Junction disposal cell in accordance with the RAP.

The contractor is responsible for all the activities required to D&D and remediate any man made ancillary structures that are associated with the relocation and disposal of the RRM. This may include, but not be limited to, Former Atlas Legacy Building, Container Lidding Building, the construction water system, rail and associated structures, the evaporation pond, haul roads, sediment ponds/basins, other basins and ponds, transformers, trailers, utility poles, etc.

The contractor shall remove and remediate these man made ancillary facilities upon DOE's determination that they are no longer needed or are hindering excavation, transportation and disposal progress.

DOE, in consultation with other agencies and stakeholders, might elect to keep a portion of the ancillary structures and facilities for future use. The contractor will verify the list of ancillary structures and facilities with DOE prior to commencing work.

The facility D&D work is to include demolishing all man-made structures/ components including building slabs and below-grade structures. The D&D of below-grade man-made structures shall be coordinated with site cleanup requirements and the subsequent remediation of mill tailings. The initial phase of a facility D&D will generally address above-grade structures; if soil remediation is required and is not performed immediately, the contractor shall perform appropriate activities to stabilize the area and prevent surface water accumulation in sub-grade structures. Stabilization of the area may include leaving the building slab in place until the area is ready for below-grade D&D and remediation of contaminated media.

C.2.5 Transportation

The contractor shall comply with the September 2005 Moab Uranium Mill Tailings ROD, the Amended ROD dated February 2008, and any future amendments to transport materials. The contractor shall be responsible for entering into arrangements with Union Pacific for the transportation of the RRM. Oversized materials and/or debris that cannot be shipped by rail shall be transported to the Crescent Junction disposal cell by truck.

The RRM shall be transported in accordance with the U.S. Department of Transportation special permits (DOT/SP/14283) for the transportation of radioactive materials and all applicable plans, permits, rules, and regulations.

The contractor shall:

- Submit Transportation Plan;
- Maintain and renew as necessary all applicable permits associated with rail and highway transportation;
- Make all necessary arrangements with Union Pacific and the Utah Department of Transportation (UDOT) for rail and highway transportation.
- In accordance with the existing Union Pacific agreement, maintain and perform repairs, as necessary, to the rail line at the EmKay (Moab) site and Brendel (Crescent Junction) site;
- Transport RRM from the tailings pile, off-pile, and vicinity property in accordance with the ROD and any amendments;
- Transport D&D debris from the Moab site;
- Haul oversized material and all debris from the former mill site and facilities from Moab to Crescent Junction by truck, providing trucks, trailers, or other appropriate equipment as necessary.

C.2.6 Crescent Junction Operations

C.2.6.1 Disposal Cell Placement and Compaction

The contractor shall conduct all disposal cell operations at Crescent Junction in accordance with the Final Remedial Action Plan (RAP), approved by the NRC.

The contractor is responsible for all aspects of the disposal activities at Crescent Junction including, but not limited to, movement of excavation equipment, trucks, container stackers, etc., in all areas including haul roads, the disposal cell, and all activities taking place at the rail facilities. The contractor shall manage and operate the movement of the containers, trucks, and equipment in complete coordination with rail car and/or truck loading/unloading activities, container dumping, tailings and debris placement, and disposal cell excavation.

The contractor is responsible for preparation and disposal of all RRM wastes generated from remedial action in this PWS. This includes design, excavation and construction of the disposal cell, and placement and compaction of RRM. The contractor is responsible for ensuring that excavation and placement of the waste is proportional to the amount of RRM identified in this PWS for removal from the Moab site. The contractor shall minimize the stockpiling of the RRM at Crescent Junction.

The contractor is responsible for Operations and Maintenance (O&M) of the existing Construction Water System, including the pipeline from the Green River and the pond at Crescent Junction, for dust control and any other activities at Crescent Junction requiring water.

The contractor shall perform all activities related to the placement and compaction of RRM including, but not limited to:

- Comply with the approved RAP and subsequent RAP modifications;
- Haul RRM containers from the Crescent Junction rail siding to disposal cell;
- Load and unload containers onto/from the rail cars and/or trucks;
- Design, Excavate and construct disposal cell;
- Manage RRM moisture content to achieve the RRM placement criteria;
- Install and maintain standpipes per the RAP;
- Place and compact waste (RRM, off-pile, etc.) and debris in accordance with requirements of the NRC-approved Remedial Action Plan;
- Control surface water erosion to the maximum extent practicable;
- Operate and maintain and expand as necessary the Construction Water System; and
- Perform dust control activities.

C.2.6.2 Disposal Cell Interim Cover

The contractor shall construct the interim cover in stages in order to prevent excessive areas of the cell remaining open while awaiting arrival of RRM shipments for placement in the disposal cell. The contractor shall comply with the approved RAP and subsequent RAP modifications. Any proposed changes to disposal cover materials (i.e., material source selection) must meet NRC Remedial Action Plan requirements and must have DOE approval.

C.2.6.3 Disposal Cell Final Covers

The contractor shall construct all layers of the remaining covers (beginning with the radon barrier) in order to prevent excessive areas of the cell remaining open. The contractor shall comply with the approved RAP and subsequent RAP modifications including re-vegetation of the disposal cell and surrounding areas, as required. Any proposed changes to disposal cover materials (i.e., material source selection) must meet NRC Remedial Action Plan requirements and must have DOE approval.

C.2.7 Project Support

The contractor shall provide all project support necessary for performance of this contract. This is an ongoing activity.

C.2.7.1 Regulatory Compliance

The Moab project is regulated by the NRC under Title I of the Uranium Mill Tailings Radiation Control Act of 1979. The State of Utah has no regulatory authority with regards to the management and disposition of RRM. However, there are numerous other site activities that fall under the purview of State

regulations (fugitive dust emissions, storm water pollution prevention, etc.). To the extent the contractor is responsible for activities conducted under this PWS, the contractor shall ensure that both the Moab and Crescent Junction sites, as well as the contractor's activities, are compliant with all applicable laws and regulations. The contractor shall obtain and administer all required permits and agreements necessary to complete the requirements of this PWS.

The Moab Uranium Mill Tailings ROD, dated September 2005, and the Amended Record of Decision for the Remediation of the Moab Uranium Mill Tailings, Grand and San Juan Counties, Utah, February 29, 2008 is applicable to Moab and Crescent Junction activities.

The Final Remedial Action Plan (RAP) was approved by the NRC in August 2008. The contractor shall construct and excavate the cell per the Final RAP for the disposal of RRM at Crescent Junction. The contractor shall place the RRM in the Crescent Junction disposal cell in accordance with the NRC approved final RAP. Any proposed deviations from the Final RAP shall be submitted to DOE for DOE and NRC for approval.

The contractor shall:

- Obtain and administer all required permits and agreements necessary to complete the requirements of this PWS;
- Verify the soil cleanup standards in 40 CFR192 have been met;
- Support independent verification by TAC and/or other outside entity (e.g., ORISE) of soil remediation;
- Submit a completion report for each off-pile area to DOE within 60 days after verification sampling is completed;
- Apply "supplemental standards" (40 CFR 192-21) when necessary (e.g., to off-pile area). Such supplemental standards applications shall be approved by DOE and the NRC and applied accordingly by the contractor;
- The contractor shall perform activities required for environmental monitoring and reporting for the Moab Project Site.
- Conduct all operations in accordance with the Storm Water Pollution Prevention Plan (SWP3) at the Moab site and Crescent Junction site;
- Submit a monthly inspection report per the SWP3;
- Submit an inspection report after each significant precipitation event. Control dust at the Moab and Crescent Junction sites via water: contractor shall aggressively manage and maintain a "zero visible" level;

C.2.7.2 Site Access Control

The contractor is responsible for ensuring security of the sites. The contractor shall provide security guard coverage 24 hours/7 days per week at both the

Moab site and Crescent Junction site to safeguard property and control access to the sites and the radiologically contaminated areas.

The contractor shall:

- Provide security guard coverage for Moab and CJ sites, 24 hours/7 days per week;
- Control access to sites;
- Control access when necessary to vicinity property(ies) as directed by the CO.

C.2.7.3 Site Support

The contractor is responsible for providing support to accomplish remedial action at the site safely and efficiently and providing support to DOE as necessary for data calls. The contractor shall:

- Provide information, documentation, and other assistance to DOE as required in responding to issues regarding both sites, such as mineral rights, water rights, Bureau of Land Management (BLM) and Department of Transportation (DOT) processes, and other similar issues that pertain to the contractor's activities at the sites;
- Provide support to public involvement and stakeholder interaction;
- Provide support to the TAC in its planning for development of the Long-Term Surveillance Plan;
- Provide janitorial services for Moab and Crescent Junctions sites; and
- Provide laundering of required PPE.

C.2.7.4 Project Management and Project Control

The contractor shall perform all activities to develop and maintain a project management system in accordance with clause H.17, Project Control Systems and Reporting Requirements for both the scope of work under this contract and the anticipated project environmental restoration lifecycle.

The contractor shall ensure the PMB remains aligned with the task order terms to include scope, cost and schedule. The contractor shall ensure timely response to task order modifications and declaration of changed conditions, through the submission of appropriate technical and cost proposals to maintain alignment of the PMB with the task order.

C.2.7.5 Environment, Safety, Health, and Quality

The contractor shall be responsible for establishing and maintaining an ESH&Q program (including site air monitoring program and emergency management) to ensure protection of the workers, the public, and the environment consistent with 10 CFR851, 10 CFR 830, and 10 CFR 835. The ESH&Q program shall be operated as an integral, but visible part of how the contractor conducts

business. This includes prioritizing work planning and execution, establishing clear ESH&Q priorities, allocating resources to address programmatic and operational considerations, collecting and analyzing monitoring data, and addressing all hazards for all operations and work. The contractor shall ensure that cost reduction and efficiency efforts are fully compatible with ESH&Q performance.

The contractor shall:

- Implement, and maintain an ESH&Q program including robust H&S plans;
- Implement and enforce the contractor's ESH&Q program and plans to subcontractors;
- Implement and maintain Emergency Management Program consistent with DOE O 151.1C;
- Implement and maintain the Site Air Monitoring Program; and
- Provide a quarterly site air monitoring report.

Integrated Safety Management System (ISMS)

The contractor shall implement the ISMS program that complies with the Section I Clause, Integration of Environment, Safety, and Health into Work Planning and Execution, and DOE Order 450.1A. The contractor's ISMS program shall ensure all work is performed safely and in a compliant manner that assures the workers, public, and environment are protected from adverse consequences. The contractor shall periodically review and continuously improve the ISMS.

The ISMS program shall include a lessons learned program that is compliant with DOE Order 210.2. The lessons learned program shall be structured to identify and apply available lessons in safety, quality and performance to this project as well as to capture, document, and provide lessons learned from this project for future application by others. The ISMS Program shall be subject to an annual verification review conducted by DOE.

The contractor shall:

- Develop ISMS plan to control and authorize work including lessons learned program compliant with DOE O 210.2.
- Integrate effective safety program throughout the entire work planning and execution process;
- Track and measure safety metrics;
- Ensure effective on-the-job training;
- Perform detailed job safety analysis or equivalent for each task;
- Perform detailed work package for each task.

Radiation Protection, Radiological Site Services

The contractor shall maintain a Radiation Protection Program compliant with 10 CFR 835. The contractor shall develop and maintain its own radiological site services (RSS) programs for DOE approval or adopt an existing DOE approved RSS program. In the RSS programs, the contractor shall include all DOE technical support, dosimetry data, and records necessary to demonstrate compliance with the required radiological monitoring and to verify the adequacy of site radiological control programs in protecting the health and safety of workers, the public, and the environment.

RSS includes, but is not limited to, the following components: the Moab Project Site Dosimetry Program, the Moab Project Site Internal Dosimetry Program, the Moab Project Site Instrumentation Program, and the Moab Project Site Radiological Records Program.

Industrial Hygiene

The contractor shall perform work in accordance with 10 CFR 851. The contractor's safety program shall include the appropriate hazard analyses, work permits (as applicable), industrial hygiene monitoring, and trained safety specialists. The contractor shall manage and perform work in accordance with a documented safety management system.

Quality Assurance/Quality Control

The contractor shall implement a DOE-approved Quality Assurance Program (QAP) in accordance with the EM Quality Assurance Program, EM-QA-001, prior to commencement of work affecting nuclear safety. The EM QAP provides the basis to achieve quality across the EM complex for all mission-related work while providing a consistent approach to Quality Assurance (QA).

The contractor is responsible for maintaining a Quality Assurance program in accordance with DOE Order 226.1A *Implementation of Department of Energy Oversight Policy*. The contractor's QA program shall cover the operational aspects such as environment, safety, and health; safeguards and security; emergency management; and business operations.

The contractor shall, at a minimum, annually review and update as appropriate, their QAP. The review and any changes shall be submitted to DOE for approval. Changes that reduce the level of commitments affecting nuclear safety shall be approved before implementation by the contractor.

C.2.7.6 Records Management

The contractor shall implement a records management program consistent with the Records Management Plan developed by the TAC and in compliance with the requirements for managing records in all formats, including early capture and control throughout their lifecycle in accordance with DOE O 243.1, Records Management Program, and DOE O 243.2, Vital Records.

The contractor shall be responsible for developing and maintaining sound document control systems and processes ensuring efficient tracking and retrieval of documents and information. The contractor shall support DOE compliance with the Freedom of Information Act (FOIA), Energy Employees Occupational Illness Compensation Program Act of 2000 (EEOICPA), and litigation discovery efforts including document scanning and records retrieval from on-site storage facilities.